

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**Michael Melvin, *et al***

**Plaintiffs,**

**v.**

**Honorable James Francis Kenney, *et al***

**Defendants.**

**Civil Action No. 20-3529**

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO  
MOTION TO STAY**

Plaintiffs Michael Melvin, Dan Farrelly, Brion Milligan, Mark Palma, Robert Bannan, Steven Hartzell, Jesus Cruz, and Mario Bocelli (collectively "Plaintiffs") by and through counsel, respectfully request a 7-day extension of time, until and including April 28, 2021 to file a response to Defendants' Motion to Stay. ECF No. 31.

The reason for this request is that counsel has a very heavy litigation period right now, and *pro hac vice* counsel Larry Klayman is unavailable this week to family circumstances. This brief extension will not prejudice Defendants or the Court.

Counsel for Plaintiffs have sought consent from opposing counsel for this motion but has not received any response.

Dated: April 21, 2021

Respectfully submitted,

/s/ Andrew Teitelman

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*Pro Hac Vice*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 21<sup>st</sup> day of April, 2021, a true copy of the foregoing was filed via ECF and served to all counsel of record through the Court's ECF system.

/s/ Andrew Teitelman